

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF THE APPLICATION OF)
DELMARVA POWER & LIGHT COMPANY FOR AN)
INCREASE IN ELECTRIC BASE RATES AND)
MISCELLANEOUS TARIFF CHANGES) PSC Docket No. 16-0649
(FILED May 17, 2016))

**PETITION TO INTERVENE OF
THE DELAWARE ENERGY USERS' GROUP**

The Delaware Energy Users' Group ("Petitioner"), by counsel and pursuant to the Rules of Practice and Procedure of the Delaware Public Service Commission ("Commission"), hereby petitions for leave to intervene in the above-captioned proceeding, and states as follows:

1. Petitioner is a non-incorporated association whose members are large industrial customers of Delmarva Power & Light Company ("Delmarva" or "Company"). The members participating in this intervention are as follows:

Burris Logistics
501 S.E. 5th Street
Milford, DE 19963

Christiana Care Health Services
4755 Ogletown Stanton Road
Newark, DE 19718

Delaware City Refining Company, LLC
4550 Wrangle Hill Road
Delaware City, DE 19706

Delaware Park Racetrack & Slots
777 Delaware Park Boulevard
Wilmington, DE 19804

E. I. du Pont de Nemours & Co.
Barley Mill Plaza
Building 25, Room 2154
4417 Lancaster Pike
Wilmington, DE 19805

Kuehne Chemical Company
1645 River Road
Delaware City, DE 19706

Linde Energy Services, Inc.
One Greenwich Street, Suite 200
Stewartsville, NJ 08886

2. All communications to Petitioner should be addressed to the following:

Delaware Energy Users' Group
c/o Michael J. Quinan and James G. Ritter
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909 East Main Street, Suite 1200
Richmond, VA 23219
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3. The names and contact information for Petitioner's attorneys¹ are as follows:

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¹ A motion for the admission *pro hac vice* of Mr. Quinan and Mr. Ritter in this proceeding is being filed simultaneously with this petition pursuant to Rule 72 of the Rules of the Supreme Court of Delaware.

4. As large industrial customers of Delmarva, Petitioner's members have a substantial interest in ensuring that the rates charged by the Company for electric service are just and reasonable and not unduly preferential or discriminatory. The members are directly affected by the issues raised in the Company's application, and they will be directly affected by the Commission's determinations in this proceeding. Petitioner therefore has a significant interest in the outcome of the proceeding.

5. Petitioner's interests will not be adequately represented by the other parties to the proceeding if Petitioner is not granted leave to intervene, because no other party will specifically represent the unique interests of Delmarva's industrial customers. These interests may be prejudiced, and the record may not be fully developed, if Petitioner is not permitted to participate. At the same time, Petitioner submits that its participation in the case would be in the public interest, and indeed Petitioner has been a regular participant in the Company's past proceedings at the Commission.

WHEREFORE, Petitioner respectfully requests that it be granted leave to intervene in this proceeding as a party for all purposes, including presentation of testimony and evidence, cross-examination, briefing, and oral argument.

Respectfully submitted,

DELAWARE ENERGY USERS' GROUP

By: 

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Dated: July 5, 2016

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document was delivered, by first-class

United States mail, to the following on this 5th day of July, 2016.

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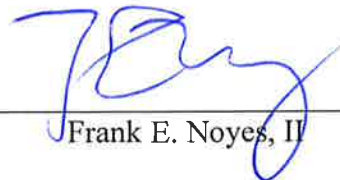
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